Mendez, Gayla

From: Purify, Johnnie

Sent: Wednesday, October 21, 2015 3:34 PM

To: Will Hendrick
Cc: Chandra Taylor

Subject: RE: NC NPDES permitting question

Hello Mr. Hendrick,

I just wanted to update you on the progress to answer the questions that you presented.

Staff have been actively working to find answers to the questions you have presented in your email. The timeline we had discussed via phone was a bit short-sighted on my part being new, but I will try to keep you abreast of any progress that is made moving forward.

At this time the historical question(s) you presented are taking the most time to run down a person who may have worked in the section during that period of time.

Thank you for your patience,

//JDP//

Johnnie D. Purify Jr.

Lieutenant Commander, U.S. Public Health Service U.S. Environmental Protection Agency, Region 4 Water Protection Division (Acting) Chief, NPDES Permitting Section/ Chief, Data and Information Analysis Section 404.562.9298 (Work) / 770.324.0957 (Mobile) purify.johnnie@epa.gov http://www.linkedin.com/in/johnniepurify



From: Will Hendrick [mailto:whendrick@selcnc.org]

Sent: Wednesday, October 14, 2015 4:05 PM
To: Purify, Johnnie <Purify. Johnnie@epa.gov>
Cc: Chandra Taylor <ctaylor@selcnc.org>
Subject: NC NPDES permitting question

Mr. Purify,

First, congratulations on your new position as Acting Branch Chief! I apologize for ambushing you on Day 2, but appreciate your willingness to help me respond to my clients' concerns. As discussed on the phone, I'm writing with some questions related to North Carolina's NPDES program. While I know NC administers the program through delegated authority pursuant to the MOA between the State and Region 4, I was hoping to gain some clarity from Region 4 before meeting with NC regulators to discuss this matter.

My questions arise from the application of <u>permitting guidance</u> adopted by NC in 2012. The guidance allows (and creates a procedure) for the reduction of the frequency of required monitoring for specified parameters in NPDES

permits issued to regulate discharges from sewerage systems (i.e., facilities included in Standard Industrial Classification category 4952). I would be thankful for any answers you can provide to the following inquiries:

- (1) Under the MOA, the State must keep EPA "fully informed and up-to-date regarding" both "[d]raft and final policy and program documents related to the State NPDES program" and "[d]raft, proposed, and final technical guidance and policies which pertain to the State NPDES program." Was Region 4 was made aware of the issuance of the guidance in 2012? If so, was the guidance approved by EPA?
- (2) Under 40 CFR 122.62, "If a permit modification satisfies the criteria in § 122.63 for 'minor modifications' the permit may be modified without a draft permit or public review. Otherwise, a draft permit must be prepared and other procedures in part 124 (or procedures of an approved State program) followed." Under § 122.63, modifications requiring "more frequent monitoring or reporting by the permittee" are considered "minor modifications." Are permit modifications that require less frequent monitoring or reporting by the permittee also considered "minor modifications"?
- (3) Under the MOA, the State is responsible for drafting permits "in accordance with 40 CFR Parts 122-123." If a permit modification made pursuant to the 2012 guidance would lessen the frequency of required monitoring, must NC prepare a draft permit?
- (4) Under the MOA, EPA "will review all draft State NPDES program permits, permit modifications and revocation and reissuances" for "discharges from publicly owned treatment works (POTWs) with a daily average permitted discharge of at least 1.0 million gallons per day." Does Region 4 review draft permit modifications made pursuant to the 2012 guidance, or is Region 4 simply alerted after the fact? (For instance, did EPA review the proposed modification of the NPDES permit issued for the operation of the Siler City WWTP—a POTW permitted to discharge up to 4.0 MGD—prior to issuance of modified monitoring requirements? See attached).
- (5) Under the MOA, public notice is required "whenever a draft permit has been prepared under 40 CFR Section 124.6(d) or a hearing has been scheduled pursuant to 40 CFR Section 121.12." If the 2012 guidance is applied to lower monitoring frequency, and a draft permit is required, must NC provide public notice?
- (6) Under NC rules applicable to NC's NPDES program, "Modifications and reissuance of permits shall be subject to the same public notice and other procedural requirements as the issuance of permits" with limited exceptions, one of which is applicable to "modifications of the monitoring program contained in the permit." 15A NCAC 2H .0114. If reducing the frequency of requiring monitoring is not a minor modification, is this NC rule consistent with 40 CFR 122.62?

Thanks in advance for your help. I was glad to learn that this general issue was already on Region 4's radar. I look forward to the help that you and your staff will provide.

Best, Will

Will Hendrick

Associate Attorney
Southern Environmental Law Center
601 W. Rosemary Street, Suite 220
Chapel Hill, NC 27516-2356
(919) 967-1450
whendrick@selcnc.org

This electronic message and any attached files are confidential and are intended solely for the use of the addressee(s) named above. This communication may contain material protected by attorney-client, work product or other privileges.



North Carolina Department of Environment and Natural Resources

Pat McCrory Governor

Donald R. van der Vaart Secretary

May 4, 2015

Mr. Bryan Thompson, Town Manager Town of Siler City P. O. Box 769 Siler City, North Carolina 27344-0769

Subject: NPDES Permit Modification

Permit Number NC0026441

Siler City WWTP Chatham County

Dear Mr. Thompson:

Division personnel have reviewed and approved your application for minor modification of the subject permit. Accordingly we are forwarding the attached modified permit page. Please remove the existing "Effluent Limitations and Monitoring Requirements" page and replace it with the one attached to this letter.

This modification reduces the effluent monitoring frequencies for Biochemical Oxygen Demand (BOD₅), Total Suspended Solids (TSS) and Fecal Coliform from daily to 2/week monitoring. The modification was based upon an evaluation of three years of facility effluent monitoring data. The facility's performance satisfies the criteria established in the "DWQ Guidance Regarding the Reduction of Monitoring Frequencies in NPDES Permits for Exceptionally Performing Facilities" as approved by the Director of the Division of Water Resources on October 22, 2012, and justifies reduced monitoring for these parameters. The modified monitoring frequencies will become effective on June 1, 2015.

Ammonia Nitrogen (NH₃-N) did not meet the guidance standard that no more than 15 daily sampling results over the 3-year (36 months) review period (March 2012 to February 2015) can be over 200% of the monthly average limit for NH₃-N. For parameters with summer and winter limits, an annual arithmetic mean of the seasonal limits was used in the calculation which was 1.42 mg/L [seven (7) months with 1.0 mg/L and five (5) months with 2.0 mg/L]. Sixteen (16) daily samples were greater than 200% of this arithmetic mean which is 2.83 mg/L. Monitoring frequency for Ammonia Nitrogen (NH₃-N) is <u>daily</u>.

This modification is issued pursuant to the requirements of North Carolina General Statute 143-215.1 and the Memorandum of Agreement between North Carolina and the U.S. Environmental Protection Agency dated October 15, 2007 (or as subsequently amended).

Mr. Thompson NC0026441 Monitoring Frequency Reduction 2015 Page 2 of 2

Please note that this permit is not transferable except after notice to the Division. The Division may require modification or revocation and reissuance of the permit. This permit does not affect the legal requirements to obtain other permits which may be required by the Division of Water Resources or any other Federal, State, or Local governmental permits that may be required.

If you have any questions concerning this permit, please contact Derek Denard at telephone number (919) 807-6307 or via e-mail at derek.denard@ncdenr.gov.

Sineerely,

Jay Zimmerman, Director

Division of Water Resources, NCDENR

attachment

cc: Central Files

DWR/Raleigh Regional Office - Danny Smith

NPDES Permit File

ec: EPA Region 4 [r4npdespermits@epa.gov]

Part I

A. (1) EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

a. During the period beginning with the effective date and lasting until expiration, the Permittee is authorized to discharge treated wastewater through Outfall 001. Such discharges shall be limited and monitored by the Permittee as specified below:

a sa	EF	FLUENT LIM	its		UNG REQUI	
PARAMETERS	Monthly Average	Weekly Average	Daily Maximum	Measurement Frequency	Sample	Sample Location ²
Flow .	4.0 MGD			Continuous	Recording	Influent or Effluent
BOD, 5 day, 20°C ³ (April 1 thru October 31)	5.0 mg/L	7.5 mg/L		2/Week ¹⁰	Composite	Influent and Effluent
BOD, 5 day, 20°C ³ (November 1 thru March 31)	10.0 mg/L	15.0 mg/L		2/Week ¹⁰	Composite	Influent and Effluent
Total Suspended Solids ³	30.0 mg/L	45.0 mg/L		2/Week ¹⁰	Composite	Influent and Effluent
NH3 as N (April 1 thru October 31)	1.0 mg/L	3.0 mg/L		Daily	Composite	Effluent
NH3 as N (November 1 thru March 31)	2.0 mg/L	6.0 mg/L		Daily	Composite	Effluent
Fecal Coliform (geometric mean)	200/ 100 ml	400/ 100 ml		2/Week ¹⁰	Grab	Effluent
Total Residual Chlorine (TRC) ⁴			17 μg/L	Daily	Grab	Effluent
Temperature (°C)				Daily	Grab	Effluent
Dissolved Oxygen	Daily	average ≥ 6.0 r	ng/L	Daily	Grab	Effluent
pH	≥ 6.0 ar	ıd ≤ 9.0 standar	d units	Daily	Grab	Effluent
Total Nitrogen (NO ₂ + NO ₃ + TKN)				Weekly	Calculated	Effluent
NO3-N + NO2-N (mg/L)				Weekly	Composite	Effluent
TKN (mg/L)				Weekly	Composite	Effluent
Total Phosphorus ⁵ (April 1 thru September 30)	0.5 mg/	L (quarterly ave	erage)	Weekly	Composite	Effluent
Total Phosphorus ⁵ (October 1 through March 31)	2.0 mg/	L (quarterly ave	erage)	Weekly	Composite	Effluent
Total Cadmium 6	2.1 μg/ L		15.5 μg/ L	Monthly	Composite	Effluent
Total Copper				Quarterly ⁷	Composite	Effluent
Total Zinc				Quarterly ⁷	Composite	Effluent
Chloride				Quarterly ⁷	Composite	Effluent
Chronic Toxicity ⁸				Quarterly	Composite	Effluent
Effluent Pollutant Scan	Mo	nitor and Report		Footnote 9	Footnote 9	Effluent
					2 500000	Linucit

Footnotes:

- No later than March 1, 2015, begin submitting discharge monitoring reports electronically using NC DWR's eDMR application system. See Condition A. (7).
- 2. Instream monitoring shall be performed in accordance with Condition A. (2).
- The monthly average effluent BOD5 and Total Suspended Solids concentrations shall not exceed 15 % of the respective influent value (i.e., 85% removal is required).
- 4. TRC limits and monitoring requirements apply only if chlorine or chlorine derivatives are used for disinfection. The Permittee shall report all effluent TRC values reported by a NC-certified laboratory [including field-certified]. Effluent values below 50 µg/L will be treated as zero for compliance purposes.
- 5. Compliance with the Total Phosphorus limits shall be based on a calendar-quarter average of weekly samples.
- Total Cadmium limits become effective December 1, 2015. Monitoring shall begin on the effective date. See Condition A. (6).

Footnotes A.(1) Continued:

- Sample Quarterly in conjunction with Chronic Toxicity Test.
- Chronic Toxicity (Ceriodaphnia) at 90 %; quarterly during March, June, September, December [see Condition A. (8)].
- The permittee shall perform three Effluent Pollutant Scans during the term of this permit [see Condition A. (9)].
- 10. Sampling must occur on any two non-consecutive days during the calendar week (Sunday through Saturday).
- b. Effluent shall contain no floating solids or foam visible in other than trace amounts.

A. (2) INSTREAM MONITORING REQUIREMENTS

Parameter	Sample Type	Location 1	Measurement Frequency 2
Dissolved Oxygen	Grab	LCU, LCD, RRU, RRD	3/Week (June - September), 1/Week (October-May)
Temperature	Grab	LCU, LCD, RRU, RRD	3/Week (June – September), 1/Week (October-May)
Total Phosphorus	Grab	LCU, LCD, RRU, RRD	Monthly
TKN	Grab	LCU, LCD, RRU, RRD	Monthly
NO ₃ -N + NO ₂ -N	Grab	LCU, LCD, RRU, RRD	Monthly

Footnotes:

- 1. LCU Loves Creek, upstream of the discharge; LCD Loves Creek, downstream of the discharge and above the confluence with the Rocky River; RRU - Rocky River, upstream of the confluence with Loves Creek; RRD - Rocky River, downstream of the confluence with Loves Creek.
- 2. All monitoring is required to be performed at the above-mentioned monitoring locations. Instream Monitoring may be performed by the Upper Cape Fear River Basin Association as outlined in the Memorandum of Agreement (MOA) between the association and the permittee. If so, the data is to be collected and submitted to DWR in accordance to the terms of the MOA. Should membership in this association terminate for any reason, the permittee shall immediately notify the Division's NPDES Unit in writing and resume responsibility to monitor and report the above parameters as specified in this permit.

A. (3) NUTRIENT REOPENER

In the event that Permittee proposes to accept future industrial process wastewater that is expected to contain concentrations of Total Nitrogen (TN) and/ or Total Phosphorus (TP) greater than typical domestic wastewater concentration (i.e. greater than 40.0 mg/ L TN or greater than 5.0 mg/ L TP), the Permittee shall notify the NPDES Complex Permitting Unit of the Division at 1617 Mail Service Center, Raleigh, NC 27699 and the Raleigh Regional Office at 3800 Barrett Drive, Raleigh, NC 27609 within 30 days of knowledge that the town is considering accepting new industrial process wastewater containing excess nutrients. The notification shall contain information regarding the proposed discharge flow, composition and treatability in the Siler City WWTP. Changes in effluent characteristics may require a permit modification, so notification should be at least 180 days prior to the start of the proposed discharge.

Based on information provided by the Town regarding a potential new industrial process wastewater with high nutrient concentration, and pursuant to N.C. General Statute Section 143-215.1 and the implementing rules found in Title 15A of the North Carolina Administrative Code, Subchapter 2H, specifically, 15A NCAC 2H.0112(b) (1) and 2H.0114(a), and Part II, Sections B-12 and B-13 of this permit, the Director of DWR may then reopen this permit to require supplemental nutrient limits for Total Nitrogen and/ or Total Phosphorus in accordance with the current Basin Plan for the Cape Fear River Basin.

Town of Siler City

SILER CITY, NORTH CAROLINA 27344-0769

PO BOX 769 311 N SECOND AVENUE



PHONE (919) 742-4731 FAX (919) 663-3874

March 25, 2015

RECEIVED/DENR/DWR

NC Department of Environment and Natural Resources
Division of Water Quality/NPDES Unit

ATTN: Mr. John Hennessy 1617 Mail Service Center Raleigh, NC 27699-1617 APR - 2 2015

Water Quality Permitting Section

Subject: NPDES Perm

NPDES Permit Modification Request

Sampling Reduction Request

Town of Siler City

NPDES Permit #NC0026441

Chatham County

Dear Mr. Hennessy:

The Town of Siler City is requesting a minor permit modification of NPDES Permit NC0026441 for a reduction in sampling. We request that monitoring for BOD₅, TSS, Ammonia Nitrogen and Fecal Coliform be reduced under the "exceptionally performing facilities" criteria to two times per week. The attached data (summarized in the following table) indicates that the WWTP effluent has exceeded the minimum criteria for reduced monitoring. The most restrictive summer limit was used for calculating all BOD₅ and Ammonia Nitrogen removal rates. In addition to the test results, the Siler City WWTP is in compliance with all other criteria listed in <u>Section B Approval Criteria</u> of the October 22, 2012 guidance document regarding reduction of monitoring frequencies. The date used for this analysis was for the period of January 2012 – February 2015.

Analysis of testing results for the past three years:

Percent of Monthly Average Limit

Parameter	Monthly Limit	3-Year Average	% of Limit
BODs	5.0 mg/l	1.5 mg/l	30 %
TSS	30.0 mg/L	0.7 mg/L	2.5 %
NH ₃	1.0 mg/l	0.21 mg/l	21%

Fecal Coliform	200/100 ml	5.5 colonies/100 ml	3 %

Number of Samples Over 200% of Monthly Average Limit

200% of Monthly Limit	Number of Samples Over
10 mg/l	2
60 mg/L	0
2 mg/l	4
	60 mg/L

The Town appreciates the Division's effort to reduce the regulatory and monetary burden on systems that strive consistently to provide exceptional wastewater treatment. We thank you for your consideration in these matters. If you have any additional questions or comments, please call Chris McCorquodale at 919/742-4581.

Sincerely,

Bryan Thompson, Town Manager

Town of Siler City

Three Year Data Summary - Siler City NPDES #0026441

2012		e 30D Max	TSS Ave	TSS Max	FC Ave	FC Max	NH ₃ Ave	NH ₃ Max
January	1.0	6.3	0.0	< 2.5	1	2	1.2	3.5
February	0.0	2.0	0.0	< 2.5	1	1	0.0	< 0.5
March	0.0	2.0	0.0	< 2.5	1	1	0.0	< 0.5
April	1.7	4.2	0.0	< 2.5	1	3	0.0	< 0.5
May	2.5	4.1	0.0	< 2.5	2	295	0.0	< 0.5
June	2.4	3.8	0.0	< 2.5	3	9	0.0	< 0.5
July	4.1	5.7	0.0	< 2.5	5	57	0.1	8.0
August	2.1	4.2	0.1	< 2.5	4	16	0.0	< 0.5
September	1.3	4.1	0.1	< 2.5	10	32	0.0	< 0.5
October	8.0	2.9	0.0	< 2.5	4	14	0.0	< 0.5
November	0.8	3.9	0.0	< 2.5	2	6	0.0	< 0.5
December	0.5	2.3	0	< 2.5	1	1	0.1	<0.5
2013	BOD Av	e 3OD Ma:	TSS Ave	TSS Max	FC Ave	FC Max	NH, Ave	NH ₃ Max
January	1.4	5.5	0.3	3.3	1.2	4		
February	2.0	4.4	2.1	7.3	1.2	2	0.5	3.0
March	2.9	8.9	3.6	7.5	1		0.4	3.7
April	1.5	3.6	0.0	< 2.5	2	1 11	1.0	4.0
May	2.1	4.1	0.3	1.0	14	200	0.0	<0.5
June	1.4	4.0	0.1	< 2.5	18		0.0	<0.5
July	1.9	8.6	0.3	3.6	39	45	0.1	2.0
August	0.9	4.6	0.0			265	0.5	5.4
September	1.1	5.0	0.0	< 2.5	40	133	0.0	<0.5
October	0.6	4.4	0.0	< 2.5	29	56	0.0	<0.5
November	1.4	7.1	0.0	< 2.5	20	43	0.1	<0.5
December	2.1	15.1	0.0	< 2.5	22	1900	0.1	<0.5
occinoc.	2.1	13.1	0.0	< 2.5	2	11	0.0	<0.5
2014	-	3OD Ma:	TSS Ave	TSS Max	FC Ave	FC Max	NH ₃ Ave	NH ₃ Max
January	0.6	4.6	0.2	4.2	2	535	0.1	2.3
February	1.3	3.9	0.5	3.9	1	4	1.3	6.2
March	4.1	25.5	3.8	44.0	2	3	1.3	8.3
April	2.7	3.9	0.0	< 2.5	4	16	0.0	< 0.5
May	2.8	6.7	0.9	8.9	44	760	0.1	0.9
June	1.3	4.0	0.0	< 2.5	43	230	0.0	< 0.5
July	1.6	5.6	0.2	< 2.5	26	59	0.1	8.0
August	0.7	4.8	0.4	4.7	23	420	0.5	5.2
September	0.6	4.0	0.0	< 2.5	38	57	0.0	< 0.5
October	0.7	3.6	0.0	< 2.5	27	48	0.0	<0.5
November	1.3	3.5	4.5	13.0	30	381	0.0	<0.5
December	1.1	3.1	3.4	10.2	6	23	0.0	< 0.5
2015	BOD Ave	3OD Ma:	TSS Ave	TSS Max	FC Ave	FC Max	NH₃ Ave	NH ₃ Max
January	2.3	5.2	3.7	10.3	4	240	0.0	0.5
February	1.1	5.7	2.2	7.3	2	14	0.1	1.4
3-Year Arithmetic Average	1.5		0.7				0.21	
3-Year Geometric Mean Average					5.5		 .	
Permit Limit	5.0		30.0		200		1.0	
% of Limit	30%		2.5%		3%		21%	

1	<i>f</i> .
٤.	
	DATE S/1/2015 Facility Name Siler City Whitp NPDES Permit # NC 00 2644
	Have any Civil Penalties assessed against the facility during the past 3 years? Yes / No
	Data Review 12 - Feb 17 Not Since (2/02/03
	Period of Review (POR) Mer Period of Review (POR)
	From: To: Feb 15
	BOD 60710
	Number of permit limit violations for BOD that occurred during the previous year
	Permit Monthly Average Limit 5.0 + 10.0 7.08
	3 Year Effluent Data Average 2.60 mg/L
	5 Highest Daily Values During POR
	25.5 Date: 3/10/14
	15.6 Date: 3/11/14
	<u>8,9</u> Date: <u>7/6/13</u>
	TSS (USIO
	Permit Monthly Average Limit mg/L
	3 Year Effluent Data Average 2.92 mg/L
	5 Highest Daily Values During POR
	44 Date: 3/10/14
	Date: 3/11/14
	<u> </u>

NH_3-N CO	610	
Number o	of permit limit violations for NH3-N that occurred during the	e previous year
	erage Limit 1.0 +2.0 = 1.42	
3 Year Effluent Data	a Average mg/L	
5 Highest Daily Val	ues During POR	
8.3 8.3 6.2 5.8 5.4	Date: 7/10/14 Date: 7/11/14 Date: 2/18/14 Date: 1/12/17	
Pecal Coliform/Ent Number of previous year	f permit limit violations for Fecal Coliform/Enterococci that	at occurred during the
Permit Monthly Ave	erage Limit 200 /100ml	
3 Year Effluent Data	Geometric Mean 5.78 /100ml	
5 Highest Daily Valu	ues During POR	
1900 760 535 420 381	Date: $11/15/13$ Date: $5/16/14$ Date: $1/3/14$ Date: $8/13/14$ Date: $(1/21/14)$	
Daily data must be de	epicted graphically on attached sheets for each parameter.	
I certify that the inforcemplete to the best of	rmation provided on this permit modification request sheet of my knowledge.	is accurate and
Signature/Title		

Data Review Summary Monitoring Frequency Reduction Evaluation

Facility Name NPDES Permit Receiving Stream 303(d) listed? Data Period of Review Reviewed by Date Siley City WWTP NC00 26 441 Loves (recle 17-43-10 Basin: Cape Fear For Listed For Fecal Colibra The ang of Heavy The stream of H
Permit Limits: Summer 1 months Winter Weekly Avg. Monthly Avg. Weekly Avg. Weekly Avg. Weekly Avg.
3 Year Average 14.16 2.60 mg/L 15.0
3 Year Average # Daily Values > 60 mg/L Meets the review guidance standards for this parameter?
NH ₃ -N Permit Limits: Summer Monthly Avg. Weekly Avg. Monthly Avg. Weekly Avg. 1.0 mg/L 3.0 mg/L Winter Weekly Avg. Weekly Avg. 2.0 mg/L E 0 mg/L
3 Year Average # Daily Values > 2.83 mg/L Meets the review guidance standards for this parameter? Lange = 0.71
3 Year Geometric Mean # Daily Values > 200 Meets the review guidance standards for this parameter? ## Daily Values > 200 ## Daily V
Attach Violation and Enforcement Reports

DATE

05/01/2015

Facility Name

Siler City WWTP

NPDES Permit #

NC0026441

Have any Civil Penalties assessed against the facility during the past 3 years? No: Not since 2003. See attached Permit Enforcement History by Permit.

Data Review

Period of Review (POR)

From: March 2012 To: February 2015

BOD

<u>O</u> Number of permit limit violations for BOD that occurred during the previous year: See attached Monitoring Report(MR) Violations 03-2013 to 02-2015. No action, best professional judgment was taken for a 02/28/2015 missing BOD. Unsafe to sample due to winter storm.

Permit Monthly Average Limit: 5.0 / 10.0 mg/L (Summer/Winter) [7.08 mg/L annual arithmetic

mean of seasonal limits]

3 Year Effluent Data Average: 2.60 mg/L: See attached CO310 -BOD data.

5 Highest Daily Values During POR

25.5

Date: 03/10/2014

15.6

Date: 03/11/2014

15.1

Date: 12/19/2013

8.9

Date: 03/06/2013

8.9

Date: 03/07/2013

TSS

<u>0</u> Number of permit limit violations for TSS that occurred during the previous year: See attached Monitoring Report(MR) Violations 03-2013 to 02-2015. No action, best professional judgment was taken for a 02/28/2015 missing TSS. Unsafe to sample due to winter storm.

Permit Monthly Average Limit 30 mg/L

3 Year Effluent Data Average 2.92 mg/L: See attached CO530 -BOD data.

5 Highest Daily Values During POR

<u>44</u>

Date: 03/10/2014

<u>27</u>

Date: 03/11/2014

<u><25</u>

Date: 09/21/2012

13

Date: 11/25/2014

10.3

Date: 01/12/2015

NH₃-N

- Number of permit limit violations for NH₃-N that occurred during the previous year: See attached Monitoring Report(MR) Violations 03-2013 to 02-2015. No action, best professional judgment was taken for a 02/28/2015 missing NH₃-N. Unsafe to sample due to winter storm.
 Permit Monthly Average Limit 1.0 / 2.0 mg/L (summer/winter) [1.42 mg/L annual arithmetic mean of seasonal limits]
- 3 Year Effluent Data Average 0.64 mg/L See attached CO610 NH3-N data.

5 Highest Daily Values During POR

<u>8.3</u>	Date: <u>03/10/2014</u>
<u>8.3</u>	Date: 03/11/2014
<u>6.2</u>	Date: 02/28/2014
<u>5.8</u>	Date: <u>02/18/2014</u>
<u>5.4</u>	Date: <u>07/12/2013</u>

Fecal Coliform/Enterococci

Only Number of permit limit violations for Fecal Coliform/Enterococci that occurred during the previous year: See attached Monitoring Report(MR) Violations 03-2013 to 02-2015. No action, best professional judgment was taken for a 02/28/2015 missing Fecal Coliform. Unsafe to sample due to winter storm.

Permit Monthly Average Limit 200 /100ml

3 Year Effluent Data Geometric Mean 5.78 /100ml: See attached 31616 - Fecal Coliform data.

5 Highest Daily Values During POR

<u>1900</u>		Date: 11/15/2013
<u>760</u>	•	Date: 05/16/2014
<u>535</u>		Date: 01/02/2014
<u>420</u>		Date: 08/13/2014
381		Date: 11/21/2014

Data Review Summary

Monitoring Frequency Reduction Evaluation

Facility Name

Siler City WWTP

NPDES Permit

NC0026441

Receiving Stream

Loves Creek [17-43-10] Basin: Cape Fear

303(d) listed?

Yes: Listed for DO, Benthos Fair, and Fish Tissue Hg (see attached

2012 North Carolina 303(d) List-Category 5

Data Period of Review

March 2012- February 2015

Reviewed by

Derek Denard

Date

May 1, 2015

BOD₅

Permit Limits:

Summer (7 months)

Winter (5 months)

Monthly Avg.

Weekly Avg.

Monthly Avg.

Weekly Avg.

5.0 mg/L

7.5 mg/L

10.0 mg/L

15.0 mg/L

[used 7.08 mg/L annual arithmetic mean of seasonal limits] 3 Year Average

2.60 mg/L

(target = 3.54)

Daily Values > 14.6 mg/L

Meets the review guidance standards for this parameter? Yes

TSS

Permit Limits:

All Months

Monthly Avg.

Weekly Avg.

30 mg/L

45 mg/L

3 Year Average

2.92 mg/L (target = 15)

Daily Values > 60 mg/L

Meets the review guidance standards for this parameter? Yes

NH₃-N

Permit Limits:

Summer

Winter

Monthly Avg.

Weekly Avg. 3.0 mg/L

Monthly Avg. 2.0 mg/L

Weekly Avg. 6.0 mg/L

1.0 mg/L . [used 7.08 mg/L annual arithmetic mean of seasonal limits]

3 Year Average

0.64 mg/L (target = 0.71)

Daily Values > 2.83 mg/L

16

Meets the review guidance standards for this parameter? NO: more than 15 daily (16) sampling results in the review period over the 200% of monthly average limit

Fecal Coliform/Enterococci

Permit Limits:

All Months

Monthly Avg. 200/100 ml

Weekly Avg. 400/100 ml

3 Year Geometric Mean

5.78 (target = 100)

Daily Values > 800

Meets the review guidance standards for this parameter? Yes

Attach Violation and Enforcement Reports

DWQ Guidance Regarding the Reduction of Monitoring Frequencies in NPDES Permits for Exceptionally Performing Facilities

October 22, 2012

A. Purpose

In its efforts to reduce the regulatory burden upon permittees while maintaining adequate compliance oversight over point source discharges, DWQ has developed the following guidance for the reduction of monitoring frequencies in NPDES permits for specific target parameters. Standard minimum NPDES monitoring frequencies are established in 15A NCAC 2B .0508 for discharges from facilities with specific Standard Industrial Classification (SIC) categories. However, 2B .0508(b)(1) states: "If it is demonstrated to the satisfaction of the Director that any of the tests and measurements, sampling points, or frequency of sampling requirements, as required in this Rule for a particular SIC group, are not applicable to the discharge of a particular water pollution control facility, or if it can be demonstrated that the objectives of this Section can be achieved by other acceptable means then such requirements may be waived or modified to the extent that the Director determines to be appropriate." This document identifies criteria to be used by DWQ that satisfies the regulatory standard for the allowance of reduced monitoring frequencies for facilities included in SIC 4952.

This guidance applies to facilities with outstanding NPDES program compliance histories, exhibiting effluent discharges that are excellent in both quality and consistency. Such performance will demonstrate that compliance for particular parameters can be adequately evaluated with less monitoring. Facilities demonstrating consistent, long-term treatment performance at levels far below effluent limitations (<50%) may be considered for a reduction in monitoring from existing permit frequencies to a 2/week minimum frequency for the parameters BOD₅, CBOD₅ TSS, NH₃-N and fecal coliform/enterococci (the "target parameters").

B. Approval Criteria

Individual NPDES facilities shall submit a written request to modify their NPDES permit specifying which parameters are to be considered for reduced monitoring. Permit holders must include with their requests sufficient data, statistical analyses, and other information to support the justification for reduced monitoring. NPDES permit staff shall review the application and supporting information. Approval of reduced monitoring frequency shall be granted if all the criteria below are met:

- The facility has no more than one civil penalty assessment for permit limit violations for each target parameter during the previous three years.
- Neither the permittee nor any of its employees have been convicted of criminal violations of the Clean Water Act within the previous five years.
- The facility is not currently under an SOC for target parameter effluent limit noncompliance.
- The facility is not on EPA's Quarterly Noncompliance Report for target parameter limit violations.
- For BOD₅, CBOD₅, TSS, NH3-N and TSS, the three year arithmetic mean of effluent data must be less than fifty percent of the monthly average permit limit. For fecal coliform or enterococci, the

three year geometric mean must be less than 50 percent of the monthly average permit limit. For parameters with summer and winter limits, an annual arithmetic mean of the seasonal limits may be used in the calculation.

- With the exception of fecal coliform or enterococci, no more than 15 daily sampling results over the 3-year review period can be over 200% of the monthly average limit for BOD₅, CBOD₅, TSS, or NH3-N. Values associated with documented impacts of extreme weather or events beyond the control of the permittee will not be included.
- For fecal coliform or enterococci, no more than 20 daily sampling results may be over 200% of the
 weekly average limit. Values associated with documented impacts of extreme weather or events
 beyond the control of the permittee will not be included.
- For the four target parameters, sampling results shall not show more than two non-monthly average limit violations during the previous year.
- Reduced effluent monitoring must not impair assessment of sensitive downstream uses, such as endangered species.

C. Implementation

After DWQ review and approval, the facility's NPDES permit will be reissued with reduced monitoring frequencies for qualified parameters. Additional NPDES permit requirements will include:

- Eligible facilities may be granted a reduction from existing permit monitoring frequencies to a 2/week minimum frequency for the four target parameters. Reductions will be made for both effluent and influent sampling.
- Where monitoring is reduced to twice per week, it must occur on any two non-consecutive days during the calendar week (Sunday through Saturday).
- Required monitoring frequency reductions establish new permit minimums for monitoring. As always, facilities may monitor more often than required in the permit.
- If a reportable event, as defined by the permit [e.g., Part II (E) (6 & 9)] occurs, any facility granted reduced monitoring frequencies will be encouraged to monitor on a daily basis until the episode is resolved.

Monitoring frequency reduction from the minimum frequencies reductions established by the rules are based upon consistent, exceptional performance. DWQ may revoke on a case-by-case basis these reductions if the facility begins to perform in noncompliance with permit limits. If a facility's monitoring reduction for a specific parameter is removed through permit modification, reconsideration of monitoring frequency reduction will only occur three years following the revocation/permit modification action, or at the next permit renewal.

Permit Enforcement History by Permit

Facility: Siler City WMTP County: Chatham

NC0026441 Raleigh

Permit: Region:

Owner: Town of Siler City

Case Number	Penalty Assessment Approved	Penalty Amount	Enforcement Costs	Damages	Remission Request Received	Enforcement Conference Held	EMC Hearing Held	Collection Memo Sent To AGO	Total Paid	Balance Due	Has Payment Plan	Case
LV-1999-0276	07/22/99	\$1,000.00	\$47.73						\$1,047.73	\$0.00	S	08/24/99
LV-1999-0462	11/29/89	\$1,250.00	\$47.73						\$1,297.73	\$0.00	8	01/10/00
LV-2000-0055	02/23/00	\$2,250.00	\$47.73						\$2,297.73	\$0.00	Š	04/03/00
LV-2000-0138	05/12/00	\$1,000.00	\$29.96						\$1,029.96	\$0.00	ş	05/25/00
LV-2000-0385	09/07/00	\$1,000.00	\$29.96	10.7					\$1,029.96	\$0.00	2	10/09/00
LV-2000-0425	10/05/00	\$2,250.00	\$47.73						\$2,297.73	\$0.00	8	10/18/00
LV-2001-0443	10/30/01	\$1,000.00	\$53.07						\$1,053.07	\$0.00	8	11/28/01
LV-2001-0520	12/19/01	\$250.00	\$53.07						\$303.07	\$0.00	N _O	01/07/02
LV-2003-0685	10/23/03	\$500.00	\$44.00						\$544.00	\$0.00	S.	12/02/03
LV-2003-0686	10/23/03	\$2,000.00	\$44.00						\$2,044.00	\$0.00	Š	12/02/03
LV-2003-0687	10/23/03	\$4,000.00	\$44.00						\$4,044.00	\$0.00	ş	12/02/03
Total Cases:	=	\$16,500.00	\$488.98						\$16,988.98	\$0.00		
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MONITORING REPORT (MR) VIOLATIONS for:	R) VIOLATIONS for:			Bonort Date.	05/01/15	Ċ		
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Monitoring Violation	iolation										
MONITORING	G OUTFALL PPI	LOCATION	PARAMETER	VIOLATION	FREQUENCY	UNIT OF	LIMIT	CALCULATED	3.	VIOLATION TYPE	MOLEDA MOLEA ION
02-2015	001	Effluent	BOD, 5-Day (20 Deg. C) - Concentration	02/28/15	5 X week	mg/l		20.00	500	Frequency Violation	No Action, BPJ
02-2015	001	Effluent	Coliform, Fecal MF, M-FC Broth,44.5C	02/28/15	5 X week	#/100ml				Frequency Violation	No Action, BPJ
02-2015	100	Effluent	DO, Oxygen, Dissolved	02/28/15	5 X week	∏gm				Frequency Violation	No Action, BPJ
02-2015	100	Effluent	Nitrogen, Ammonia Total (as N) - Concentration	02/28/15	5 X week	l/gm				Frequency Violation	No Action, BPJ
02-2015	100	Effluent	Н	02/28/15	5 X week	ns				Frequency Violation	No Action, BPJ
02-2015	100	Effluent	Temperature, Water Deg. Centigrade	02/28/15	5 X week	o bep				Frequency Violation	No Action, BPJ
Other Violation	디										
MONITORING	G OUTFALL/ PPI	LOCATION	PARAMETER	VIOLATION	FREQUENCY	UNIT OF MEASURE	LIMIT	CALCULATED	* }	VIOLATION TYPE	NOITON NOITON
03-2013			7.	03/11/13					5	Aquatic toxicity permit	Proceed to NOV
										limit violation	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \

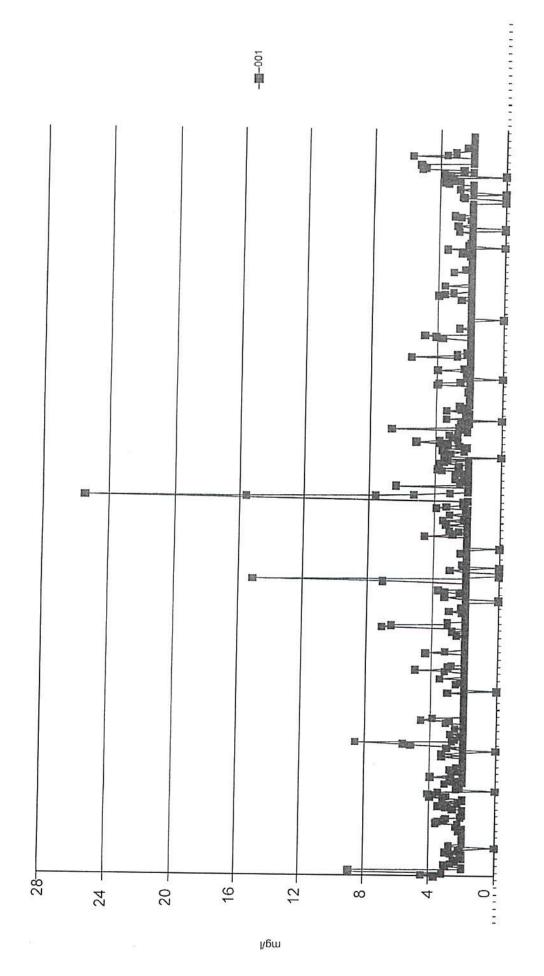
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PERMIT NUMBER: NC0026441

FACILITY NAME: Town of Siler City - Siler City WMTP

SAMPLE LOCATION: Effluent

PARAMETER: CO310 - BOD, 5-Day (20 Deg. C) - Concentration



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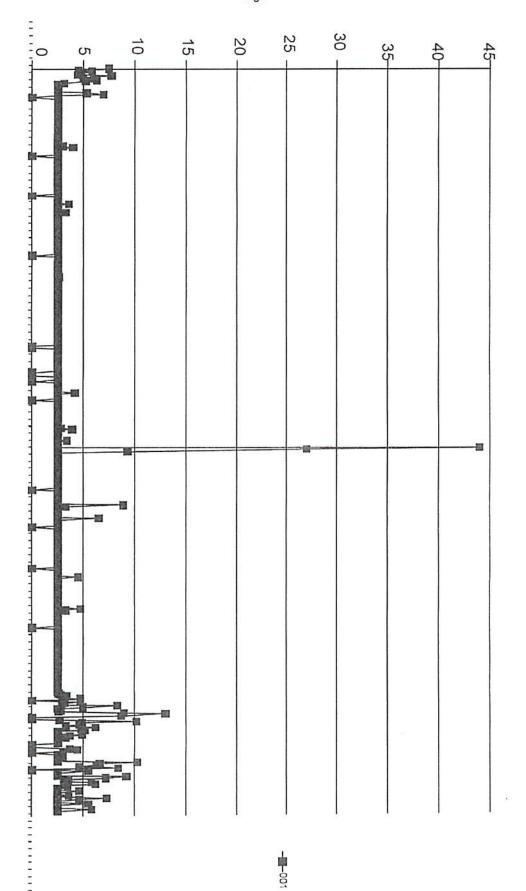
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PERMIT NUMBER: NC0026441

FACILITY NAME: Town of Siler City - Siler City WWTP

SAMPLE LOCATION: Effluent

PARAMETER: CO530 - Solids, Total Suspended - Concentration



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From:

Will Hendrick < whendrick@selcnc.org >

Sent: To:

Wednesday, October 21, 2015 4:14 PM

Subject:

Purify, Johnnie

RE: NC NPDES permitting question

Attachments:

removed.txt

Mr. Purify,

I appreciate your prompt attention to my questions and the efforts underway to thoroughly answer them. I look forward to hearing from you soon.

Best, Will

From: Purify, Johnnie [mailto:Purify.Johnnie@epa.gov]

Sent: Wednesday, October 21, 2015 3:34 PM

To: Will Hendrick Cc: Chandra Taylor

Subject: RE: NC NPDES permitting question

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Thank you for your patience,

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Sent: Wednesday, October 14, 2015 4:05 PM

To: Purify, Johnnie < Purify.Johnnie@epa.gov <a href="mailto:Cc: Chandra Taylor ctaylor@selcnc.org Subject: NC NPDES permitting question

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Will Hendrick

Associate Attorney
Southern Environmental Law Center
601 W. Rosemary Street, Suite 220
Chapel Hill, NC 27516-2356
(919) 967-1450
whendrick@selcnc.org

From:

Will Hendrick <whendrick@selcnc.org> Thursday, November 19, 2015 11:47 AM

Sent: To:

Purify, Johnnie

Subject:

RE: NC NPDES permitting question

Attachments:

removed.txt

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Chief, Data and Information Analysis Section 404.562.9298 (Work) / 770.324.0957 (Mobile) purify.johnnie@epa.gov http://www.linkedin.com/in/johnniepurify

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whendrick@selcnc.org

From:

Purify, Johnnie

Sent:

Thursday, November 19, 2015 12:36 PM

To:

Will Hendrick

Subject:

RE: NC NPDES permitting question

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All the best,

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whendrick@selcnc.org

From:

Will Hendrick <whendrick@selcnc.org> Thursday, December 03, 2015 1:59 PM

Sent: To:

Purify, Johnnie

Subject:

RE: NC NPDES permitting question

Attachments:

removed.txt

Mr. Purify,

Have the responses to the questions I submitted on 10/14/15 been finalized? If not, can you estimate when that will occur? I really don't mean to pester you; I'm just sure you and your staff are very busy and I don't want this to slip through the cracks (my clients are keenly interested in your answers and have repeatedly asked me for updates). Thanks in advance for your guidance. And thanks as always for the work you do to preserve water quality in Region IV.

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Sent: Thursday, November 19, 2015 12:36 PM

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Staff have been actively working to find answers to the questions you have presented in your email. The timeline we had discussed via phone was a bit short-sighted on my part being new, but I will try to keep you abreast of any progress that is made moving forward.

At this time the historical question(s) you presented are taking the most time to run down a person who may have worked in the section during that period of time.

Thank you for your patience,

//JDP//

Johnnie D. Purify Jr.

Lieutenant Commander, U.S. Public Health Service U.S. Environmental Protection Agency, Region 4 Water Protection Division (Acting) Chief, NPDES Permitting Section/ Chief, Data and Information Analysis Section 404.562.9298 (Work) / 770.324.0957 (Mobile) purify.johnnie@epa.gov http://www.linkedin.com/in/johnniepurify



From: Will Hendrick [mailto:whendrick@selcnc.org]
Sent: Wednesday, October 14, 2015 4:05 PM
To: Purify, Johnnie < Purify. Johnnie@epa.gov >
Cc: Chandra Taylor < ctaylor@selcnc.org >
Subject: NC NPDES permitting question

Mr. Purify,

First, congratulations on your new position as Acting Branch Chief! I apologize for ambushing you on Day 2, but appreciate your willingness to help me respond to my clients' concerns. As discussed on the phone, I'm writing with some questions related to North Carolina's NPDES program. While I know NC administers the program through delegated authority pursuant to the MOA between the State and Region 4, I was hoping to gain some clarity from Region 4 before meeting with NC regulators to discuss this matter.

My questions arise from the application of <u>permitting guidance</u> adopted by NC in 2012. The guidance allows (and creates a procedure) for the reduction of the frequency of required monitoring for specified parameters in NPDES permits issued to regulate discharges from sewerage systems (i.e., facilities included in Standard Industrial Classification category 4952). I would be thankful for any answers you can provide to the following inquiries:

- (1) Under the MOA, the State must keep EPA "fully informed and up-to-date regarding" both "[d]raft and final policy and program documents related to the State NPDES program" and "[d]raft, proposed, and final technical guidance and policies which pertain to the State NPDES program." Was Region 4 was made aware of the issuance of the guidance in 2012? If so, was the guidance approved by EPA?
- (2) Under 40 CFR 122.62, "If a permit modification satisfies the criteria in § 122.63 for 'minor modifications' the permit may be modified without a draft permit or public review. Otherwise, a draft permit must be prepared and other procedures in part 124 (or procedures of an approved State program) followed." Under § 122.63, modifications requiring "more frequent monitoring or reporting by the permittee" are considered "minor modifications." Are permit modifications that require less frequent monitoring or reporting by the permittee also considered "minor modifications"?
- (3) Under the MOA, the State is responsible for drafting permits "in accordance with 40 CFR Parts 122-123." If a permit modification made pursuant to the 2012 guidance would lessen the frequency of required monitoring, must NC prepare a draft permit?
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- (5) Under the MOA, public notice is required "whenever a draft permit has been prepared under 40 CFR Section 124.6(d) or a hearing has been scheduled pursuant to 40 CFR Section 121.12." If the 2012 guidance is applied to lower monitoring frequency, and a draft permit is required, must NC provide public notice?
- (6) Under NC rules applicable to NC's NPDES program, "Modifications and reissuance of permits shall be subject to the same public notice and other procedural requirements as the issuance of permits" with limited exceptions, one of which is applicable to "modifications of the monitoring program contained in the permit." 15A NCAC 2H .0114. If reducing the frequency of requiring monitoring is not a minor modification, is this NC rule consistent with 40 CFR 122.62?

Thanks in advance for your help. I was glad to learn that this general issue was already on Region 4's radar. I look forward to the help that you and your staff will provide.

Best, Will

Will Hendrick

Associate Attorney
Southern Environmental Law Center

601 W. Rosemary Street, Suite 220 Chapel Hill, NC 27516-2356 (919) 967-1450 whendrick@selcnc.org

From:

Purify, Johnnie

Sent:

Friday, December 04, 2015 9:59 AM

To: Cc:

Will Hendrick Purify, Johnnie

Subject:

RE: NC NPDES permitting question

Hello Mr. Hendrick,

A draft response has been developed, but it must be vetted before finalizing. The time frame for release is dependent upon the level of scrutiny the response warrants.

Thank you for your patience, and your request has not been forgotten.

All the best,

//JDP//

Johnnie Purify, LCDR, USPHS (Acting) Chief, Water Quality Planning Branch/ Chief, Data Information and Analysis Section Purify.Johnnie@epa.gov 404-562-9298

From: Will Hendrick [mailto:whendrick@selcnc.org]

Sent: Thursday, December 3, 2015 1:59 PM

To: Purify, Johnnie

Subject: RE: NC NPDES permitting question

Mr. Purify,

Have the responses to the questions I submitted on 10/14/15 been finalized? If not, can you estimate when that will occur? I really don't mean to pester you; I'm just sure you and your staff are very busy and I don't want this to slip through the cracks (my clients are keenly interested in your answers and have repeatedly asked me for updates). Thanks in advance for your guidance. And thanks as always for the work you do to preserve water quality in Region IV.

Best, Will

From: Purify, Johnnie [mailto:Purify.Johnnie@epa.gov]

Sent: Thursday, November 19, 2015 12:36 PM

To: Will Hendrick

Subject: RE: NC NPDES permitting question

Good Day Mr. Hendrick,

The response to your questions is being finalized and is forthcoming.

All the best,

//JDP//

Johnnie D. Purify Jr.

Lieutenant Commander, U.S. Public Health Service U.S. Environmental Protection Agency, Region 4 Water Protection Division (Acting) Chief, NPDES Permitting Section / Chief, Data and Information Analysis Section 404.562.9298 (Work) / 770.324.0957 (Mobile) purify.johnnie@epa.gov http://www.linkedin.com/in/johnniepurify



From: Will Hendrick [mailto:whendrick@selcnc.org]
Sent: Thursday, November 19, 2015 11:47 AM
To: Purify, Johnnie < Purify.Johnnie@epa.gov >
Subject: RE: NC NPDES permitting question

Mr. Purify,

Are there any updates/answers that you can provide at this time? I understand that you have a lot on your plate, and I certainly wasn't expecting my questions to be a high priority. That said, it has been over a month since my initial inquiry, and my clients are still interested to learn Region 4's take on the issues presented.

You indicated that my historical questions were the most difficult to answer. I appreciate the diligence with which your staff continues to seek answers to those questions. However, would it be possible at this time to answer the non-historical questions (i.e, #s 2,3,5 & 6), as doing so essentially only requires interpretation/application of federal regulations?

I sincerely appreciate your help on this matter, and hope I don't seem impatient. I just want to get to the bottom of this issue and believe your opinion/guidance to be critical to achieving resolution.

Thanks again, Will

From: Purify, Johnnie [mailto:Purify.Johnnie@epa.gov]

Sent: Wednesday, October 21, 2015 3:34 PM

To: Will Hendrick **Cc:** Chandra Taylor

Subject: RE: NC NPDES permitting question

Hello Mr. Hendrick,

I just wanted to update you on the progress to answer the questions that you presented.

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